

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

In re

CITY OF DETROIT, MICHIGAN,

Debtor.

No. 13-53846

Chapter 9

HON. STEVEN W. RHODES

**EXHIBIT 3**

**APPELLEE STATE OF MICHIGAN'S DESIGNATION OF  
ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

In connection with Notice of Appeal filed by  
William M. Davis and DAREA [Dkt. #8473].

<b>Item</b>	<b>Date Filed</b>	<b>Docket Number</b>	<b>Description</b>
3	8/22/2013	565	Objection to Chapter 9 Bankruptcy filed by creditors Carl Williams, Hassan Aleem

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

Hassan Aleem and Carl Williams  
Creditors

vs  
|

Case No. 13-53846

Hon. Steven W. Rhodes

CITY OF DETROIT, MICHIGAN  
AND EMERGENCY MANAGER  
KEVYN D. ORR

Debtors

U.S. BANKRUPTCY COURT  
E.D. MICHIGAN-DETROIT

2013 AUG 22 P 1:32

FILED

**OBJECTION TO CHAPTER 9 BANKRUPTCY**

Now Comes the creditor in pro se Hassan Aleem a retired builder  
inspector for city of Detroit and Carl Williams an interest party and both  
taxpayers in the city of Detroit and the state of Michigan.

The creditor and interest party object to the Bankruptcy for the  
following:

1) The Public Act 436 that the Bankruptcy is relying on did not receive  
the constitutional three-four vote as required to challenge the referendum of



the people in accordance to Article II section 9 of the Michigan constitution.

2) The Emergency Manager Kevyn Orr violated the Administrative Procedure Act 24.201 by not publishing his orders for sixty 60 days and hearing before it can become effective. The Supreme Court would sua sponte vacate order of state tax commission in equalization case for failure of the commission to proceed in accordance with the Administrative Procedures Act *Saginaw County v. State Tax Commission* (1974) 224 N.W.2d 283, 393 Mich 779, affirmed 244 N.W. 2d 909, 397 Mich. 550

3) We never received notice and hearing, which is a denial of due process of law. In the present context these principles require that a person have timely and adequate notice detailing the reasons for the notice and an effective opportunity to defend. *Armstrong v. Manzo*, 380 U. S. 545, 552 (1965).

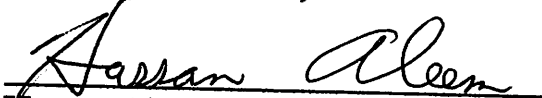
4) The Local emergency financial assistance loan board mean the local emergency financial assistance loan board created under section 2 of the emergency municipal loan act 1980 PA 243, 243 MCL 141.932. The financial loan board responsibility is to loan money and not to appoint the emergency manager.

5) The emergency manager failed to comply with P.A. 436 by not providing a written mandatory financial and operating plan for the local government within 45 days after the emergency manager appointment, thus due process of law violation Article 1 section 2 of Michigan State Constitution and the 5th and 14th Amendment of the Constitutions of the United States

The Financial manager, Kevyn Orr have not shown any plan to reduce the so call financial trouble the local city have before or after the 45 days.

Wherefore and the above reason we pray that this court grant relief declaring the bankruptcy invalid and null and void.

Sincerely submitted,



Hassan Aleem  
2440 Taylor  
Detroit, Michigan 48205



Carl Williams  
10112 Somerset  
Detroit, Michigan 48224



and interest party in this bankruptcy action and resident of Detroit, Taxpayers of the State of Michigan, and Citizens of the United States.

We never received notice and hearing, which is a denial of due process of law. In the present context these principles require that a person have timely and adequate notice detailing the reasons for the notice and an effective opportunity to defend. *Armstrong v. Manzo*, 380 U. S. 545, 552 (1965).

That the law and facts herein this in this affidavit in support of the objection of the bankruptcy. We have read and understand the facts to be true.

That we the affiants, if sworn as a witness, can testify competently to the facts stated in the objection and is true and correct to the best of our knowledge and belief.

Signed Carl Williams Hassan Reem

**Subscribed and sworn to before me,**

**This 20<sup>th</sup> Day of August 2013**

Gloria Ann Surles  
Notary Public

GLORIA ANN SURLS  
NOTARY PUBLIC, STATE OF MI  
COUNTY OF WAYNE  
MY COMMISSION EXPIRES Sep 15, 2017  
ACTING IN COUNTY OF *Wayne*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

Hassan Aleem and Carl Williams  
Creditors

vs  
|

Case No. 13-53846

Hon. Steven W. Rhodes

CITY OF DETROIT, MICHIGAN  
AND EMERGENCY MANAGER  
KEVYN D. ORR

Debtors

STATE OF MICHIGAN)

) SS

COUNT Y OF WAYNE)

U.S. BANKRUPTCY COURT  
E.D. MICHIGAN-DETROIT

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FILED

**PROOF OF SERVICE**

Carl Williams, being first duly sworn, deposes  
and Say: that on August 21 2013. I sent a copies of Objection to Chapter 9  
Bankruptcy upon the concern parties by certified mail, at the following  
address:

City of Detroit  
Corporation Council  
First National Building  
600 Woodward Ave  
Detroit, Michigan 48226

Emergency Manager  
Kevyn Orr  
Coleman A. Young Municipal Center  
2 Woodward 11th floor  
Detroit, Michigan 48226

Sign Carl Williams

Subscribed to and sworn to before me

This 21 day of August 2013,

Chanta Auel  
Notary

